

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Revisions to Rules Authorizing the Operation of	)	WT Docket No. 08-166
Low Power Auxiliary Stations in the 698-806	)	
MHz Band	)	
	)	
Public Interest Spectrum Coalition, Petition for	)	WT Docket No. 08-167
Rulemaking Regarding Low Power Auxiliary	)	
Stations, Including Wireless Microphones, and the	)	
Digital Television Transition	)	
	)	
Amendment of Parts 15, 74 and 90 of the	)	ET Docket No. 10-24
Commission's Rules Regarding Low Power	)	
Auxiliary Stations, Including Wireless	)	
Microphones	)	

**COMMENTS OF THE NATIONAL ASSOCIATION OF BROADCASTERS  
IN SUPPORT OF THE MOTION FOR EXTENSION OF TIME**

The National Association of Broadcasters (NAB)<sup>1</sup> respectfully supports the Joint Motion for Extension of Time to File Comments<sup>2</sup> submitted in the above-captioned proceeding.<sup>3</sup>

NAB agrees with the Joint Parties that good cause exists for extending the comment deadlines in this proceeding to coincide with the deadlines for submitting

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<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission, other federal agencies, and the courts.

<sup>2</sup> Joint Motion for Extension of Time to File Comments, WT Docket Nos. 08-166 and 08-167, and ET Docket No. 10-24, Shure Incorporated, Audio-Technica U.S., Inc., ESPN, Inc., Lectrosonics, Inc., Robert Bosch LLC, Sennheiser Electronic Corporation, The Society of Broadcast Engineers, Inc., and The National Football League (collectively, "Joint Parties") (filed Nov. 8, 2012) ("Joint Motion").

<sup>3</sup> Public Notice, *The Wireless Telecommunications Bureau and the Office of Engineering and Technology Seek to Update and Refresh Record in the Wireless Microphones Proceeding*, WT Docket Nos. 08-166 and 08-167 and ET Docket No. 10-24, DA 12-1570 (Oct. 5, 2012) ("*Public Notice*"); Public Notice, *The Wireless Microphones Proceeding, Comment Deadlines Established*, DA 12-1763 (Nov. 2, 2012).

comments on the Notice of Proposed Rulemaking (“NPRM”) in the proceeding regarding broadcast incentive auctions.<sup>4</sup> Many of the issues raised in this proceeding are similar and closely linked to those raised in the Incentive Auctions NPRM. For example, the Commission seeks comment in the Public Notice on whether to expand the universe of eligible users of wireless microphones, and what actions should be taken to improve the spectral efficiency of wireless microphones,<sup>5</sup> while noting in the Incentive Auctions NPRM that repacking the UHF TV bands may reduce the amount of spectrum that is available for use by wireless microphones.<sup>6</sup> Indeed, the Public Notice instructs commenters to specifically account for “related Commission proceedings that affect use of wireless microphones, including the TV White Spaces proceeding and the Incentive Auctions proceeding.” Public Notice at 1.

As the Joint Parties explain, parties interested in responding to the Public Notice will need to consider and reflect their not-yet finalized views on the Incentive Auctions NPRM. Joint Motion at 4. The respective inquiries should not be considered independently. Enabling parties to comment on these issues simultaneously will improve the records in both proceedings.

Moreover, the Joint Parties note that the Public Notice raises complex technical and operational issues concerning wireless microphones that will broadly and significantly impact both wireless microphone manufacturers and users. Joint Motion at 7. Providing interested parties with additional time to examine these issues thoroughly

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<sup>4</sup> Joint Motion at 2 *citing* Notice of Proposed Rulemaking, *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268 (Rel. Oct. 2, 2012) (“Incentive Auctions NPRM”).

<sup>5</sup> Public Notice at 3-6.

<sup>6</sup> Incentive Auctions NPRM, at ¶¶ 221-239.

will improve the record in response to the Public Notice, and in turn, enhance the Commission's decision-making process.<sup>7</sup>

Finally, NAB notes that extending the comment deadlines for the Public Notice will not cause prejudice or harm to any party.

For the reasons stated above, NAB respectfully requests that the Commission grant the Joint Motion for Extension of Time to File Comments in response to the Public Notice in this proceeding.

Respectfully submitted,



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<sup>7</sup> NAB also concurs that extension of the comment periods is warranted given the ongoing changes in the operations and use of wireless microphones necessitated by the White Spaces proceeding. See Joint Motion at 4-6. As the Joint Parties point out, certain critical procedures for unlicensed use of wireless microphones were released only a few weeks ago, or have yet to be finalized, such as the authorization of a geolocation database to operate wireless microphones on a nationwide basis. *Id.* at 5. These developments continue to unfold, and parties will need additional time to adequately consider their impact in the context of the Public Notice.